

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT

STATE OF VERMONT,	)	
Plaintiff,	)	
	)	
v.	)	
	)	
EXXON MOBIL CORPORATION,	)	
EXXONMOBIL OIL CORPORATION,	)	
ROYAL DUTCH SHELL PLC, SHELL OIL	)	Case No. 2:21-cv-260
COMPANY, SHELL OIL PRODUCTS	)	
COMPANY LLC, MOTIVA ENTERPRISES	)	
LLC, SUNOCO LP, SUNOCO, LLC, ETC	)	
SUNOCO HOLDINGS LLC, ENERGY	)	
TRANSFER (R&M), LLC, ENERGY	)	
TRANSFER LP, and CITGO PETROLEUM	)	
CORPORATION,	)	
Defendants.	)	

**PLAINTIFF'S MOTION TO REMAND**

Plaintiff State of Vermont, pursuant to 28 U.S.C. § 1447(c), moves this Court to:

(i) remand this case to the Chittenden Superior Court, where it was originally filed and from which Defendants removed it; and (ii) require Defendants to pay just costs and expenses, including attorney fees, incurred as a result of the removal. The basis for this motion will be set forth more fully in Plaintiff's memorandum of law which, pursuant to the Stipulation and Order to Stay Deadlines and for a Coordinated Briefing Schedule (Doc. 17), is to be filed on or before December 17, 2021.

DATED: November 22, 2021

Respectfully submitted,

STATE OF VERMONT

THOMAS J. DONOVAN, JR.  
ATTORNEY GENERAL



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